

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION

Chapter 13

**OBJECTION BY DEBTORS TO THE CLAIM OF
INSOLVE RECOVERY, LLC**

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Pursuant to Local Rule 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this Objection, you must file with the clerk of the court at United States Bankruptcy Court, Howard H. Baker Jr. US Courthouse, Suite 330, 800 Market St., Knoxville TN 37902, an objection within 30 days from the date this paper was filed and serve a copy on the movant's attorneys, **Richard M. Mayer** and **John P. Newton, Jr.**, 1111 Northshore Dr., Suite S-570, Knoxville TN 37919, or via Electronic Case Filing; **Patricia C. Foster**, Attorney for the U. S. Trustee, Suite 114, 800 Market St., Howard H Baker Jr. US Courthouse Knoxville TN 37902 and **Gwendolyn M. Kerney**, Chapter 13 Trustee, PO Box 228, Knoxville TN 37901. If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this document and may grant the relief requested without further notice or hearing.

Comes the Debtors and would hereby object to the claim of InSolve Recovery, LLC, filed on November 23, 2012, in the amount of \$2,658.16. A copy of the proof of claim is attached hereto as **Exhibit A** and is incorporated by reference.

As grounds for the objection, the Debtors aver that this claim is filed for a debt that is beyond the statute of limitations. The Debtors are not attaching an Affidavit as this Objection is based on procedural grounds.

Wherefore, the Debtors pray that the claim of InSolve Recovery, LLC in the amount of \$2,658.16 be disallowed in its entirety.

JOHN FREDRICK KNOWLTON

CAROLYN BETH KNOWLTON

/s/ Richard M. Mayer, #5534

/s/ John P. Newton, Jr., #010817

Attorneys for Debtors

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Dated: October 9, 2013

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and exact copies of the foregoing Objection and proposed Order have been served upon the following parties in interest herein by delivering same to said party, or by mailing same to the said party by U.S. Mail with sufficient postage thereon to carry the same to its destination and/or Electronic Case Filing on October 9, 2013.

Gwendolyn M. Kerney
Chapter 13 Trustee
PO Box 228
Knoxville, TN 37901

Patricia C. Foster, Attorney for U.S. Trustee
800 Market Street, Suite 114
Howard H. Baker, Jr., U.S. Courthouse
Knoxville, TN 37902

InSolve Recovery, LLC
c/o Capital Recovery Group, LLC
Dept. 3203
PO Box 123203
Dallas, TX 75312-3203

/s/ Richard M. Mayer, #5534

/s/ John P. Newton, Jr., #010817

Attorneys at Law